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Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
4 Declaration in the above-captioned matter in support of Uber’s Motion for (1) Entry of an Order to Show
5 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with
6 Prejudice, AND (2) Allowing Limited Depositions of 5 Plaintiffs Referenced Herein (the “Fourth
7 Fraudulent Receipts Motion”).

8 2. In an effort to seek Plaintiffs’ agreement to the relief sought in the above-referenced
9 motion, counsel for Uber initiated a meet-and-confer process.

10 3. On December 31, 2025, I sent a letter on behalf of Uber to Plaintiffs’ counsel, copying
11 MDL leadership, that requested to promptly meet and confer regarding the aforementioned Plaintiffs’
12 noncompliance with the Receipt Order. A true copy of the letter to Plaintiffs’ counsel is attached as Exhibit
13 16.

14 4. On January 2, 2026, I had a meet-and-confer via Zoom with the Pulaski Firm, counsel for
15 Plaintiffs with MDL IDs 3698, 3700, and 4243. We discussed both the motion to dismiss for Plaintiffs
16 with MDL IDs 3698 and 3700, and the depositions of all three of their clients. No agreement was reached
17 with counsel regarding the dismissal of these Plaintiffs’ cases with prejudice nor their depositions.

18 5. On January 2, 2026, I had a meet-and-confer via Zoom with the Wagstaff Law Firm,
19 counsel for Plaintiffs with MDL IDs 4097 and 4385. We discussed the motion to dismiss for both of their
20 clients. No agreement was reached with counsel regarding the dismissal of these Plaintiffs’ cases with
21 prejudice.

22 6. On January 6, 2026, I had a meet-and-confer via Zoom with Reich and Binstock, LLC,
23 counsel for Plaintiffs with MDL IDs 3879 and 4142. We discussed both the motion to dismiss for and the
24 depositions of both of their clients. No agreement was reached with counsel regarding the dismissal of
25 these Plaintiffs’ cases with prejudice nor their depositions.

26 7. Although Uber has made every effort to meet and confer on this cross-cutting issue
27 affecting several Plaintiffs, as well as many counsel, it has not been possible to reach agreement. Rather
28

1 than attempting to address this issue piecemeal, Uber submits that the relief requested is the most efficient
2 way to proceed for all parties and the Court.

3
4 I declare under penalty of perjury under the laws of the United States of America that the foregoing
5 is true and correct.

6
7
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9 Dated: January 7, 2026

Respectfully submitted,

10
11 By: /s/ Christopher V. Cotton

12 Christopher V. Cotton (admitted *Pro Hac Vice*)
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19 UBER TECHNOLOGIES, INC.;
20 RASIER, LLC; and RASIER-CA, LLC
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FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatory above concurred in this filing.

Dated: January 7, 2026

/s/ Laura Vartain Horn
Lauran Vartain Horn